

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION AT COLUMBUS

FILED
JOHN P. HEHMAN
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2013 JUL 29 AM 11:21

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIV. COLUMBUS

JANE DOE, a minor, through her father
JOHN DOE
c/o Santen & Hughes, LPA
600 Vine Street, Suite 2700
Cincinnati, Ohio 45202

Plaintiff,

vs.

KEVIN C. BOLLAERT, an individual
1765 Garnet Avenue 27
San Diego, California 92109

and

ERIC S. CHANSON, an individual;
2 Columbia Place
Princeton Junction, New Jersey 08550-1816

and

ROY E. CHANSON, an individual;
18 Peabody Lane
Mercerville, New Jersey 08619

and

AMY L. CHANSON, an individual
18 Peabody Lane
Mercerville, New Jersey 08619

and

BLUE MIST MEDIA, LLC, a limited
liability company of unknown origin, d/b/a
"YOUTOTPOSTED"; and "JOHN ROE,"
an individual,
c/o Domains by Proxy, LLC
14747 N. Northsight Blvd.
Suite 111, PMB 309
Scottsdale, Arizona 85260

CASE NO. 2:13 CV0486

Assigned to:

Judge Gregory L. Frost

Magistrate Judge Mark R. Abel

DEFENDANT ROY E. CHANSON'S
DECLARATION IN SUPPORT OF HIS
AND AMY L. CHANSON'S MOTION
TO DISMISS

Defendants.

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ROY E. CHANSON'S DECLARATION IN SUPPORT OF MOTION TO DISMISS


Pursuant to 28 U.S.C. § 1746, I, Roy E. Chanson, declare the following:

1. I am an individual residing in Princeton Junction, New Jersey. I am not now nor ever have been a resident of the state of Ohio.
2. I have been named a defendant in this action, although the Columbia Place address in the original case caption is incorrect. I reside at 21 Coneflower Lane, New Jersey 08550 along with my wife, Amy L. Chanson.
3. I make this statement in support of the Motion to Dismiss filed by myself and Amy L. Chanson ("Amy"). Unless otherwise stated, I make all the statements of fact in this declaration based on my own personal knowledge.
4. Eric S. Chanson ("Eric"), another named defendant in this action, is my son.
5. Eric does reside with me in Princeton Junction, New Jersey.
6. I have no first-hand knowledge of Eric's business activities. What knowledge I have has come from several lawsuits that have been filed against Eric in various jurisdictions, and I have no knowledge of the veracity of the statements made in those suits.
7. I have never participated or assisted Eric in any of his business activities.
8. I am not in any form of business partnership with Eric.
9. I am not in any form of business partnership with Kevin C. Bollaert, another defendant in this action.
10. I am not in any way involved with Blue Mist Media LLC, another defendant in this action. I am not an officer or partner or member of the LLC. I am not involved in any of the activities of the LLC.

11. I have never received any pecuniary benefit from any of Eric's business activities.
12. I have never received any pecuniary benefit from Kevin C. Bollaert's business activities.
13. I have never received any pecuniary benefit from Blue Mist Media LLC.
14. I had never heard of the website, "YouGotPosted," prior to reviewing the complaint in this action. I do not operate said website.
15. I have never supervised, assisted or participated in formatting and distributing any photographs appearing on YouGotPosted.
16. In fact, it would have been repugnant to me to see any such photographs, and it is repugnant to me that such photographs are being distributed in the manner of the YouGotPosted website, i.e., as "revenge pornography," or in any manner.
17. Prior to the filing of this lawsuit, I had never seen any photographs of the Plaintiff in this action, Jane Doe. I have never handled, formatted, watermarked or distributed any photographs of Jane Doe. I have no knowledge of Jane Doe, except what has been stated in her complaint, and I have no knowledge of the veracity of those statements.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 26th day of July 2013



Roy E. Chanson